

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

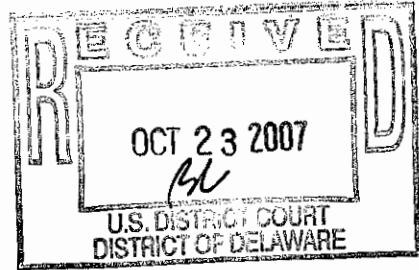
GEORGE A. JACKSON, et al.,

Plaintiffs,

v.

STANLEY TAYLOR, et al.,

Defendants.



REQUEST FOR ADMISSION, SET NUMBER 20 ARE PROPOUNDED

TO: Defendants Joseph Adkins, Debbie Melvin, Steven Raynor, Weston White,  
Robert Manuel, Richard Crockett and Bethany Evans

BY Plaintiff George A. Jackson

YOU ARE HEREBY REQUIRED TO ADMIT the truthfulness of each of  
the facts set forth below; and the genuineness of each document, a copy of  
which is attached to this Request.

EACH OF THE FOLLOWING FACT IS TRUE:

1. Heating, ventilation, and air condition (HVAC), related processed  
designed to regulate ambient conditions within buildings for comfort or for  
industrial purposes. Heating an area raises temperature in a given space  
to a more satisfactory level than that of the atmosphere.

2. Ventilation, either separately, or in combination with the heating  
or air condition system, controls both the supply and exhaust of air within  
given areas in order to provide sufficient oxygen to the occupants and to  
eliminate odors.

3. Air conditioning designates control of the indoor environment year-  
round to create and maintain desirable temperature, humidity, air circulation,  
and purity for the occupants of that space or for the industrial materials  
that are handled or stored there.

4. Plaintiffs' complaint alleges inadequate ventilation and air flow on the "old-side" of the SCI main kitchen, especially during summer months.

5. During the filing of the George A. Jackson's "emergency grievance" on July 19, 2005, the "old-side" SCI main kitchen was operating with eight (8) commercial size convectional ovens, four (4) commercial sizes conventional ovens, two (2) commercial size cooking braisers, large flat top grill, and a six (6) burner pilot stove.

6. All the above commercial size appliances on the "old-side" main kitchen at SCI, have a caution plate stamp on the back of each appliances to not install unless under a exhaust hood system.

7. During cold winter temperature in the SCI main kitchen, inmate workers are not issued thermal wear, nor are they allowed to wear adequate winter clothes in the food preparation/production area.

8. Plaintiffs' original and amended complaint alleges that, "contaminated food being sent out to the prison population."

9. On July 20, 2005, contaminated food was reported to the Food Service staff at the SCI main kitchen pertaining to Beef Cube Steak.

10. Sample of Beef Cube Steak that was prepared from the July 20th, 2005 meal, was forward to Michael Knight, Food Service Administrator.

11. Sample Beef Cube Steak were discovered to be contaminated with larva.

12. The SCI main kitchen have east and west alcove doors.

13. Prior to July 2005, the SCI main kitchen east and west alcove doors were not self-closing doors.

14. Former inmate kitchen worker Joshua Hudson, suffered a serious injury to his fingers when one of the SCI main kitchen alcove doors slammed against his fingers.

15. After the injury to inmate Joshua Hudson, maintenance repair both

east and west alcove doors to be self-closing.

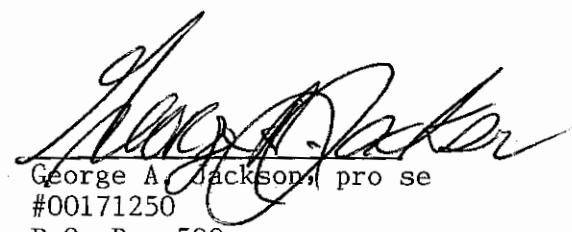
16. SCI Food Service staff does not maintain certification records of frequent and regular inspection of the main kitchen, food, and equipment to be made.

17. When inmate workers make verbal complaints about excessive heat and/or extreme cold, Food Service staff makes no general assessment of the inmate complaint before notifying Food Service Director or DOC maintenance.

18. Inmate kitchen workers are told to drink plenty of water and given breaks when temperature at the SCI main kitchen rise and/or exceeds 100 degree.

19. There is only one (1) toilet seat for the use of 22-25 inmate kitchen workers per shift.

20. The Food Service staff office and Food Service Director Chris Senato's office at the SCI main kitchen are both equip with aircondition units.



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CERTIFICATE OF SERVICE

I, George A. Jackson, hereby certify that on October 20, 2007, I filed the attached Request For Admissions to Defendants' counsel by placing them in the SCI prison U.S. mailbox, to be forward to:

Catherine Damavandi, ID#3823  
Deputy Attorney General  
Department of Justice  
Carvel State Bldg., 6th Fl.  
820 N. French Street  
Wilmington, DE 19801

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